

1 RUSSELL E. MARSH, ESQUIRE  
2 Nevada Bar No. 11198  
3 WRIGHT MARSH & LEVY  
4 300 S. Fourth Street  
5 Suite 701  
6 Las Vegas, NV 89101  
7 Phone: (702) 382-4004  
8 Fax: (702) 382-4800  
9 russ@wmllawlv.com  
10 Attorneys for Defendant Thornburg

11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

10 UNITED STATES OF AMERICA, )  
11 Plaintiff, ) CASE NO. 2:18-CR-00208-RFB-DJA  
12 )  
13 vs. )  
14 ROBERT THORNBURG, )  
15 Defendant. )  
16

---

17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**STIPULATION TO CONTINUE SENTENCING HEARING  
(Second Request)**

20 IT IS HEREBY STIPULATED AND AGREED, between the United States of America, by  
21 and through its attorney, Nicholas A. Trutanich, United States Attorney, through Christopher D.  
22 Baker, First Assistant United States Attorney; and Defendant Robert Thornburg, by and through his  
23 counsel, Russell E. Marsh, Esquire, Wright Marsh & Levy, that the sentencing hearing currently  
24 scheduled for March 5, 2020, at 11:00 a.m. be vacated and set to a date and time convenient to this  
25 Court, but no sooner than fourteen (14) days from the current sentencing date.

26 This stipulation is entered into for the following reasons:

27 1. On October 31, 2019, Mr. Thornburg pleaded guilty to a Superseding Criminal  
28 Information. (ECF No. 143.)

///

///

1           2.     The parties need additional time to prepare for Defendant Thornburg's sentencing  
2 hearing. Defense counsel also requires additional time to meet with Mr. Thornburg, review  
3 documents, and prepare a sentencing memorandum. Defense counsel also requires time to review  
4 and organize voluminous materials provided by Thornburg.

5           3.     The parties agree to the continuance. Mr. Thornburg is currently in custody and  
6 agrees to the continuance.

7           4.     Additionally, denial of this request for continuance could result in a miscarriage of  
8 justice.

9           5.     The additional time requested by this Stipulation is made in good faith and not for  
10 purposes of delay.

11           6.     This is the second request for a continuance of the sentencing hearing.

12           Dated this 24th day of February, 2020.

13           Respectfully submitted:

14           WRIGHT MARSH & LEVY

16           BY /s/ Russell E. Marsh  
17           RUSSELL E. MARSH, ESQUIRE  
17           Attorney for Defendant Thornburg

14           NICHOLAS A. TRUTANICH  
15           UNITED STATES ATTORNEY

16           BY /s/ Christopher D. Baker  
17           CHRISTOPHER D. BAKER  
17           First Assistant U.S. Attorney

**UNITED STATES DISTRICT COURT**

## DISTRICT OF NEVADA

Based on the Stipulation of the parties, the sentencing hearing in this matter is hereby continued. The ends of justice served by granting said continuance outweigh the best interest of the public and the defendant in a speedy sentencing, since the failure to grant said continuance would be likely to result in a miscarriage of justice, and would deny the parties herein sufficient time and the opportunity within which to be able to effectively and thoroughly prepare for sentencing, taking into account the exercise of due diligence.

IS IT HEREBY ORDERED that the sentencing in the above-captioned matter currently scheduled for March 5, 2020, at 11:00 a.m., be vacated and continued to March 19, 2020 at 11:30 AM

DATED: February 25, 2020



**RICHARD F. BOULWARE, II**  
United States District Judge